UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAMES HAYDEN,
 	
      Plaintiff,
 	
v.
 	
2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC. ,
 	
      Defendants.
	CASE NO. 1:17-cv-02635-CAB

**DECLARATION OF MIRANDA MEANS IN SUPPORT OF DEFENDANTS
TAKE-TWO INTERACTIVE SOFTWARE, INC. AND 2K GAMES, INC.'S
MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFF JAMES HAYDEN'S
MOTION TO EXCLUDE THE EXPERT TESTIMONY OF DR. E. DEBORAH JAY**

I, Miranda Means, declare as follows:

1.   I am an Associate at the law firm of Kirkland & Ellis LLP. I submit this declaration in support of Defendants Take-Two Interactive Software, Inc. and 2K Games, Inc.'s (together, "Take-Two") memorandum of law in opposition to Plaintiff James Hayden's ("Plaintiff") motion to exclude the expert testimony of Dr. E. Deborah Jay.

2.   On July 20, 2021, Take-Two provided Plaintiff with the raw data for the survey conducted by Dr. Jay, as well as the codebook for the raw data.

3.   Attached hereto as Exhibit A is a true and correct copy of excerpts from the deposition transcript of Dr. E. Deborah Jay, dated August 24, 2021.

4.   Attached hereto as Exhibit B is a true and correct copy of Groves, Robert M., Floyd J. Fowler Jr., Mick P. Couper, James M. Lepkowski, Eleanor Singer, and Roger Tourangeau, *Questions and Answers in Surveys*, SURVEY METHODOLOGY, John Wiley & Sons, 2d ed., 2009.

5.   Attached hereto as Exhibit C is a true and correct copy of excerpts from Federal Judicial Center, *Reference Manual on Scientific Evidence* (3d ed. 2011).

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of November, 2021.   */s/ Miranda Means*
                                                Miranda Means